

The JS44 civil cover sheet and the information contained herein neither replace nor supplement the filing and service of pleadings or other papers as required by law, except as of provided by local rules of court. This form, approved by the Judicial Conference of the United States in September 1974, is required for the use of the Clerk of Court for the purpose of initialing the civil docket sheet. (SEE INSTRUCTIONS ON THE REVERSE OF THE FORM.)

**I. (a) PLAINTIFFS**

ALTARIQ COURSEY

**DEFENDANTS**

STEPHEN BREWINGTON, SCHOONMAKER CATTLE SERVICES, LLC (I/P/A SCHOONMAKER SERVICES, LLC)

(b) COUNTY OF RESIDENCE OF FIRST LISTED PLAINTIFF BERGEN COUNTY  
(EXCEPT IN U.S. PLAINTIFF CASES)

COUNTY OF RESIDENCE OF FIRST LISTED DEFENDANT DANE COUNTY, WISCONSIN  
(IN U.S. PLAINTIFF CASES ONLY)

**(c) ATTORNEYS (FIRM NAME, ADDRESS, AND TELEPHONE NUMBER)**

Robert A. Lord, Esq.  
Lord, Korbin, Alvarez & Fattell, LLC  
1283 Route 22 West  
Mountainside, NJ 07092  
Tel: 908-232-7666  
Attorneys for Plaintiff Altariq Coursey

**ATTORNEYS (IF KNOWN)**

Gina Calabria, Esq.  
Anthony Tracy, Esq.  
Kristen M. Gaffey, Esq.  
WILSON ELSEER MOSKOWITZ EDELMAN & DICKER LLP  
200 Campus Drive  
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Tel: (973) 624-0800 Fax: (973) 624-0808  
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[kristen.gaffey@wilsonelser.com](mailto:kristen.gaffey@wilsonelser.com)  
Attorneys for Defendants Stephen Brewington and Schoonmaker Cattle Services, LLC

**II. BASIS OF JURISDICTION** (PLACE AN *x* IN ONE BOX ONLY)

- ☐ 1 U.S. Government Plaintiff
- ☐ 2 U.S. Government Defendant
- ☐ 3 Federal Question (U.S. Government Not a Party)
- ☒ 4 Diversity (Indicate Citizenship of Parties in Item II)

**III. CITIZENSHIP OF PRINCIPAL PARTIES**

(For Diversity Cases Only)

(PLACE AN *x* IN ONE BOX FOR PLAINTIFF AND ONE BOX FOR DEFENDANT)

Citizen of This State	PTF <input checked="" type="checkbox"/> 1	DEF <input type="checkbox"/> 1	Incorporated or Principal Place of Business in This State	PTF <input type="checkbox"/> 4	DEF <input type="checkbox"/> 4
Citizen of Another State	2	<input checked="" type="checkbox"/> 2	Incorporated and Principal Place of Business in Another State	<input type="checkbox"/> 5	<input checked="" type="checkbox"/> 5
Citizen or Subject of a Foreign Country	<input type="checkbox"/> 3	<input type="checkbox"/> 3	Foreign Nation	<input type="checkbox"/> 6	<input type="checkbox"/> 6

**IV. CAUSE OF ACTION**

CITE THE U.S. CIVIL STATUTE UNDER WHICH YOU ARE FILING AND WRITE A BRIEF STATEMENT OF CAUSE. DO NOT CITE JURISDICTIONAL STATUTES (UNLESS DIVERSITY).

Plaintiffs allege serious and permanent injuries arising from a motor vehicle accident. Court has original jurisdiction under diversity 28 USC § 1331.

**V. NATURE OF SUIT** (PLACE AN *x* IN ONE BOX ONLY)

CONTRACT	TORTS		FORFEITURE/PENALTY	BANKRUPTCY	OTHER STATUTES
<input type="checkbox"/> 110 Insurance <input type="checkbox"/> 120 Marine <input type="checkbox"/> 130 Miller Act <input type="checkbox"/> 140 Negotiable Instrument <input type="checkbox"/> 150 Recovery of Overpayment & Enforcement of Judgment <input type="checkbox"/> 151 Medicare Act <input type="checkbox"/> 152 Recovery of Defaulted Student Loans (Excl. Veterans) <input type="checkbox"/> 153 Recovery of Overpayment of Veteran's Benefits <input type="checkbox"/> 160 Stockholders Suits <input type="checkbox"/> 190 Other Contract <input type="checkbox"/> 195 Contract Product Liability	<b>PERSONAL INJURY</b> <input type="checkbox"/> 310 Airplane <input type="checkbox"/> 315 Airplane Product Liability <input type="checkbox"/> 320 Assault, Libel & Slander <input type="checkbox"/> 330 Federal Employers Liability <input type="checkbox"/> 340 Marine <input type="checkbox"/> 345 Marine Product Liability <input checked="" type="checkbox"/> 350 Motor Vehicle <input type="checkbox"/> 355 Motor Vehicle Product Liability <input type="checkbox"/> 360 Other Personal Injury	<b>PERSONAL INJURY</b> <input type="checkbox"/> 362 Personal Injury – Med Malpractice <input type="checkbox"/> 365 Personal Injury – Product Liability <input type="checkbox"/> 368 Asbestos Personal Injury Product Liability  <b>PERSONAL PROPERTY</b> <input type="checkbox"/> 370 Other Fraud <input type="checkbox"/> 371 Truth in Lending <input type="checkbox"/> 380 Other Personal Property Damage <input type="checkbox"/> 385 Property Damage Product Liability	<input type="checkbox"/> 610 Agriculture <input type="checkbox"/> 620 Other Food & Drug <input type="checkbox"/> 625 Drug Related Seizure of Property 21 USC 881 <input type="checkbox"/> 630 Liquor Laws <input type="checkbox"/> 640 R.R. & Truck <input type="checkbox"/> 650 Airline Regs <input type="checkbox"/> 660 Occupational Safety/Health <input type="checkbox"/> 690 Other  <b>LABOR</b> <input type="checkbox"/> 710 Fair Labor Standards Act <input type="checkbox"/> 720 Labor/Mgmt. Relations <input type="checkbox"/> 730 Labor/Mgmt. Reporting & Disclosure Act <input type="checkbox"/> 740 Railway Labor Act <input type="checkbox"/> 790 Other Labor Litigation <input type="checkbox"/> 791 Empl. Ret. Inc. Security Act	<input type="checkbox"/> 422 Appeal 28 USC 158 <input type="checkbox"/> 423 Withdrawal 28 USC 157  <b>PROPERTY RIGHTS</b> <input type="checkbox"/> 820 Copyrights <input type="checkbox"/> 830 Patent <input type="checkbox"/> 840 Trademark  <b>SOCIAL SECURITY</b> <input type="checkbox"/> 861 HIA (1395(i)) <input type="checkbox"/> 862 Black Lung (923) <input type="checkbox"/> 863 DIWC/DIWW (405(g)) <input type="checkbox"/> 864 SSID Title XVI <input type="checkbox"/> 865 RSI (405(g))  <b>FEDERAL TAX SUITS</b> <input type="checkbox"/> 870 Taxes (U.S. Plaintiff or Defendant) <input type="checkbox"/> 871 IRS – Third Party 26 USC 7609	<input type="checkbox"/> 400 State Reapportionment <input type="checkbox"/> 410 Antitrust <input type="checkbox"/> 430 Banks and Banking <input type="checkbox"/> 450 Commerce/ICC Rates/etc. <input type="checkbox"/> 460 Deportation <input type="checkbox"/> 470 Racketeer Influenced and Corrupt Organizations <input type="checkbox"/> 810 Selective Service <input type="checkbox"/> 850 Securities/Commodities/Exchange <input type="checkbox"/> 875 Customer Challenge 12 USC 3410 <input type="checkbox"/> 891 Agricultural Acts <input type="checkbox"/> 892 Economic Stabilization Act <input type="checkbox"/> 893 Environmental Matters <input type="checkbox"/> 894 Energy Allocation Act <input type="checkbox"/> 895 Freedom of Information Act <input type="checkbox"/> 900 Appeal of Fee Determination Under Equal Access to Justice <input type="checkbox"/> 950 Constitutionality of State Statutes <input type="checkbox"/> 890 Other Statutory Actions
<b>REAL PROPERTY</b> <input type="checkbox"/> 210 Land Condemnation <input type="checkbox"/> 220 Foreclosure <input type="checkbox"/> 230 Rent Lease & Ejectment <input type="checkbox"/> 240 Torts to Land <input type="checkbox"/> 245 Tort Product Liability <input type="checkbox"/> 290 All Other Real Property	<b>CIVIL RIGHTS</b> <input type="checkbox"/> 441 Voting <input type="checkbox"/> 442 Employment <input type="checkbox"/> 443 Housing/Accommodations <input type="checkbox"/> 444 Welfare <input type="checkbox"/> 440 Other Civil Rights	<b>PRISONER PETITIONS</b> <input type="checkbox"/> 510 Motions to Vacate Sentence Habeas Corpus <input type="checkbox"/> 530 General <input type="checkbox"/> 535 Death Penalty <input type="checkbox"/> 540 Mandamus & Other <input type="checkbox"/> 550 Civil Rights			

**VI. ORIGIN**(PLACE AN *x* IN ONE BOX ONLY)

- ☐ 1 Original Proceeding
- ☒ 2 Removed from State Court
- ☐ 3 Remanded from Appellate Court
- ☐ 4 Reinstated or Reopened
- ☐ 5 Transferred from another district (specify)
- ☐ 6 Multidistrict Litigation
- ☐ 7 Appeal to District Judge from Magistrate Judgment

**VII. REQUESTED IN COMPLAINT**

CHECK IF THIS IS A  
☐ UNDER F.R.C.P. 23

**CLASS ACTION****DEMAND \$**

Check YES only if demanded in complaint:

**JURY DEMAND:** ☒ YES ☐ NO

**VII. RELATED CASE(S)**

(See instructions)

**IF ANY:** none

JUDGE \_\_\_\_\_

DOCKET NUMBER \_\_\_\_\_

Date: July 22, 2022

SIGNATURE OF ATTORNEY ON RECORD

s/Anthony Tracy

**WILSON, ELSER, MOSKOWITZ, EDELMAN & DICKER LLP**

**Gina Calabria, Esq. (Attorney I.D. No.: 29752002)**

**Anthony M. Tracy, Esq. (Attorney I.D. No.: 030841990)**

**Kristen M. Gaffey, Esq. (Attorney I.D. No.: 281152019)**

**200 Campus Drive**

**Florham Park, New Jersey 07932-0668**

**Tel: (973) 624-0800 \* Fax: (973) 624-0808**

**Attorneys for Defendants Stephen Brewington and Schoonmaker Cattle Services, LLC  
(i/p/a Schoonmaker Services, LLC)**

UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY

\_\_\_\_\_  
ALTARIQ COURSEY,

PLAINTIFF(S),

VS.

STEPHEN BREWINGTON, SCHOONMAKER  
SERVICES, LLC, ABC CORPS 1-5, JOHN DOES:  
1-5, (SAID NAMES BEING FICTITIOUS  
NAMES AS TRUE NAMES ARE UNKNOWN  
AT THIS TIME),

DEFENDANTS.  
\_\_\_\_\_

:  
: Civil Action No. \_\_\_\_\_  
:

**NOTICE OF REMOVAL**

**TO: THE JUDGES OF THE UNITED STATES DISTRICT COURT FOR THE  
DISTRICT OF NEW JERSEY:**

**PLEASE TAKE NOTICE**, that pursuant to 28 U.S.C. §§ 1332, 1441, and 1446 (a),  
Defendants Stephen Brewington and Schoonmaker Cattle Services, LLC (i/p/a Schoonmaker  
Services, LLC) (hereinafter "Defendants") by and through their undersigned attorneys, WILSON,  
ELSER, MOSKOWITZ, EDELMAN & DICKER LLP, on this date have filed this Notice of  
Removal of a Civil Action from the Superior Court of New Jersey, Law Division, Union County,  
to the United States District Court for the District of New Jersey, together with all process,

pleadings, and Orders, as required by 28 U.S.C. § 1446 (a), copies of which are attached hereto, and made part hereof respectfully shows:

1. On June 16, 2022, Plaintiff Altariq Coursey (hereinafter "Plaintiff"), filed a civil action before the Superior Court of New Jersey, Law Division, Union County, bearing Docket number UNN-L-1734-22, entitled *"Altariq Coursey v. Stephen Brewington, Schoonmaker Services, LLC, ABC Corps 1-5, John Does 1-15 (said names being fictitious as true names are unknown at this time)"*. [See true and exact copy of Complaint, filed June 16, 2022, entitled "Complaint," annexed hereto as Exhibit "A."].

2. Plaintiff alleges he sustained “permanent” and “serious physical and emotional injuries,” including “considerable pain, anguish and suffering, shock, loss of wages, and other special damages” arising from a December 3, 2021 motor vehicle accident, where Defendants Stephen Brewington and Schoonmaker Services, LLC “carelessly and negligently” caused a collision to occur on the New Jersey Turnpike in the City of Elizabeth, County of Union, New Jersey [See Exhibit A, First Count at ¶¶ 1-4].

3. Plaintiff effected service of the Summons and Complaint on Stephen Brewington by personal service on June 27, 2022 at 5221 Mawood Street in Fayetteville, North Carolina. [See true and exact copy of Affidavit of Service dated June 27, 2022, annexed hereto as Exhibit “B”].

4. Plaintiff effected service of the Summons and Complaint on Schoonmaker Cattle Services, LLC, by personal service on July 3, 2022 at 4991 County Road North in Sun Prairie, Wisconsin. [See true and exact copy of Affidavit of Service dated July 3, 2022, annexed hereto as Exhibit “C”].

5. Defendants seek removal of this action pursuant to 28 § 1332 because it arises between citizens of different states and the amount in controversy is in excess of \$75,000.

6. Plaintiff resides in the City of Edgewater, County of Bergen, New Jersey. [*See* Exhibit A].

7. At all times material hereto, and continuing to the present, Stephen Brewington is a resident of the state of North Carolina [*See* Exhibit B].

8. At all times material hereto, and continuing to the present, Schoonmaker Cattle Services is a corporation, organized and existing under the laws of the state of Wisconsin with principal places of business located in Wisconsin. [*See* Exhibits C].

9. The remaining Defendants in Plaintiff's Complaint are fictitious defendants who have not been identified or served and whose citizenship must be disregarded for purposes of removal.

10. The amount in controversy exceeds the sum or value of \$75,000 because Plaintiffs allege severe and permanent injuries. [*See* Exhibit A, First Count at ¶4]. Based upon said damages, the amount in controversy requirement is satisfied. *See* 28 U.S.C. § 1332(a).

11. This action is one in which this Court has original jurisdiction under the provisions of 28 U.S.C. § 1332(a) in that complete diversity of citizenship exists — no properly joined defendant is a citizen of the same state as plaintiffs and involves alleged damages in excess of \$75,000.

12. This Notice of Removal is timely filed within thirty (30) days of service of process upon Defendants pursuant to 28 U.S.C. § 1446(b). [*See* Exhibits B and C].

13. Defendants do not waive any objections, exceptions, or defenses to Plaintiff's Complaint or service thereof.

14. Upon filing the within Notice of Removal in the office of the Clerk of the United States District Court for the District of New Jersey, Defendants also filed this Notice with the Clerk of the Superior Court of New Jersey, Law Division, Union County, to effect removal of this action to the United States District Court pursuant to 28 U.S.C. § 1441 and U.S.C. § 1446(b). [A true and exact copy of the Notice filed with the Superior Court of New Jersey is annexed hereto as Exhibit "D"].

**NON-WAIVER OF DEFENSES**

15. By removing this action from the Superior Court of New Jersey, Union County, Defendants do not waive any defenses available to them.

16. By removing this action from the Superior Court of New Jersey, Union County, Defendants do not admit any of the allegations in Plaintiff's Complaint.

WHEREFORE, Defendants Stephen Brewington and Schoonmaker Cattle Services, LLC (i/p/a Schoonmaker Services, LLC) pray that given that the statutory requirements having been met, that the above-captioned action now pending in the Superior Court of New Jersey, Law Division, Union County, be removed therefrom to this Court.

WILSON, ELSER, MOSKOWITZ, EDELMAN & DICKER LLP  
Attorneys for Defendants Stephen Brewington and Schoonmaker  
Cattle Services, LLC (i/p/a Schoonmaker Services, LLC)

By: /s/ Kristen M. Gaffey  
Kristen M. Gaffey, Esq.  
Anthony Tracy, Esq.

Dated: July 22, 2022

# EXHIBIT A

**LORD, KOBRIN, ALVAREZ & FATELL, LLC**

ROBERT A. LORD, Esq. (03155-1986)

**1283 Route 22 East**

**Mountainside, New Jersey 07092**

**TELE: (908) 232-7666**

**FAX: (908) 232-7545**

**Attorneys for Plaintiff(s)**

<b>ALTARIQ COURSEY,</b> <b>Plaintiff(s),</b>  <b>vs.</b>  <b>STEPHEN BREWINGTON,</b> <b>SCHOONMAKER SERVICES, LLC, ABC</b> <b>CORPS. 1-5, JOHN DOES 1-5, (said names</b> <b>being fictitious as true names are unknown at</b> <b>this time)</b>  <b>Defendant(s).</b>	<b>SUPERIOR COURT OF NEW JERSEY</b> <b>LAW DIVISION: UNION COUNTY</b> <b>DOCKET NO.:</b>  <b><u>CIVIL ACTION</u></b>  <b>COMPLAINT, DESIGNATION OF TRIAL</b> <b>ATTORNEY, STATEMENT FOR</b> <b>DAMAGES AND JURY DEMAND</b>
--	--

Plaintiff, Altariq Coursey residing at 114 Colonial Road in the City of Edgewater, County of Bergen and State of New Jersey, by way of Complaint against the Defendant(s) say:

**FIRST COUNT**

- 1.) On or about the 3<sup>rd</sup> of December 2021, Plaintiff, Altariq Coursey was the operator of a vehicle owned by Penske Leasing & Rental and was lawfully traveling on the NJTP in the City of Elizabeth, County of Union and State of New Jersey.
- 2.) At said time and place defendant, Schoonmaker Services, LLC was the owner of a vehicle operated by defendant Stephen Brewington who was carelessly and negligently travelling at the previously mentioned location when he struck the plaintiff's vehicle causing an accident to occur.
- 3.) All times relative hereto, the defendant(s) Schoonmaker Services, LLC and Stephen Brewington had a duty and obligation to the foreseeable plaintiff to operate their motor vehicle in a safe and reasonable manner.
- 4.) As a result of the foregoing carelessness and negligence of the above mentioned



defendant(s) and as a direct proximate result of the negligence of the aforesaid, plaintiff suffered serious physical and emotional injuries both of a temporary and permanent nature, considerable pain, anguish and suffering, shock, loss of wages and other special damages.

**WHEREFORE**, plaintiff, Altariq Coursey demands judgment jointly, severally or in the alternative against all Defendants on this count for damages, interest and costs.

### **SECOND COUNT**

- 1.) The plaintiff(s), repeat and re-alleges each and every allegation set forth in the first count of this complaint as if same were set forth herein at length.
- 2.) The defendants, John Does 1 – 5, are fictitious names intended to identify any and all parties, including individuals, corporations and/or other entities whose identities are presently unknown to the plaintiff, who together with the named defendants were responsible for the ownership, operation, control, lease and maintenance of the vehicles involved in the collision referred to herein or who in anyway caused or contributed to plaintiff's injuries.
- 3.) As a result of the foregoing carelessness and negligence of the above mentioned defendant(s) and as a direct proximate result of the negligence of the aforesaid, plaintiff, suffered serious physical and emotional injuries both of a temporary and permanent nature, considerable pain, anguish and suffering, shock, loss of wages and other special damages.

**WHEREFORE**, plaintiff, Altariq Coursey demands judgment jointly, severally or in the alternative against all Defendants on this count for damages, interest and costs.

### **THIRD COUNT**

- 1.) The plaintiff(s), repeat the allegations contained in the prior counts of this Complaint and makes it a part hereof.

2.) The defendants, ABC Corps. 1 – 5, are fictitious names intended to identify any and all parties, including individuals, corporations and/or other entities whose identities are presently unknown to the plaintiff, who together with the named defendants were responsible for the ownership, operation, control, lease and maintenance of the vehicles involved in the collision referred to herein or who in anyway caused or contributed to plaintiff's injuries.

3.) As a result of the foregoing carelessness and negligence of the above mentioned defendant(s) and as a direct proximate result of the negligence of the aforesaid, plaintiff suffered serious physical and emotional injuries both of a temporary and permanent nature, considerable pain, anguish and suffering, shock, loss of wages and other special damages.

**WHEREFORE**, plaintiff, Altariq Coursey demands judgment jointly, severally or in the alternative against all defendants on this count for damages, interest and costs.

#### **DESIGNATION OF TRIAL COUNSEL**

Plaintiff designates Robert A. Lord, Esq. as Trial Counsel pursuant to Rule 4:25-4.

#### **DEMAND FOR INTERROGATORIES**

Plaintiff hereby demands answers to Uniform Interrogatories Form C and C-1.

#### **JURY DEMAND**

Plaintiff demands trial by jury on all counts in this Complaint.

#### **CERTIFICATION OF COUNSEL**

Pursuant to Rule 4:5-1 the undersigned hereby certifies that at the time of filing this Complaint, the matter in controversy is not the subject of any other action pending in any Court and/or Arbitration proceeding.

I certify that the foregoing statements made by me are true. I am aware that if any of the foregoing statements made by me are willfully false, I am subject to punishment.

LORD, KOBRIN, ALVAREZ and FATTELL

ATTORNEYS AT LAW

Attorneys for Plaintiff(s)

/s/ **ROBERT A. LORD**

BY: \_\_\_\_\_

**ROBERT A. LORD**

Dated: June 16, 2022

### **DEMAND FOR PRODUCTION OF DOCUMENTS**

Pursuant to R.4:18-1, the Plaintiffs hereby demand that the Defendant produce the following documentation within thirty (30) days as prescribed by Rules of Court. Additionally, please be advised that the following requested are continuing and ongoing in nature and the Defendant is therefore required to continuously update its response thereto as new information or documentation.

1. **The amounts of any and all insurance coverage covering the Defendant, including but not limits to, primary insurance policies, secondary insurance policies and/or umbrella insurance policies. For each such policy of insurance, supply a copy of the declaration page there from.**

2. Copies of an and all documentation or reports, including but not limited to, police reports, accident reports and/or incident reports concerning the happening of the incident in question or any subsequent investigation of same.

3. Copies of any and all photographs, motion pictures, videotapes, films, drawings, diagrams, sketches or other reproductions, descriptions, or accounts concerning the individuals involved in the incident in question, the property damage sustained, the accident scene of anything else relevant to the incident in question.

4. Copies of any and all signed or unsigned statements, documents, communications, and/or transmissions, whether in writing, made orally or otherwise recorded by any mechanical or electronic means, made by any party to this action, any witness, or any other individual, businesses, corporation, investigative authority or other entity concerning anything relevant to the incident in question.

5. Copies of any and all documentation, including but not limited to, and contracts between the owner of the property or product involved in the incident in question and any of the parties involved.

6. Copies of any and all contracts between any of the parties involved in the incident in question.

7. Copies of any and all documentation concerning any lease agreements between the lessor(s) and the lessee(s) concerning the incident in question.

8. Copies of any and all documentation, including but not limited to, safety manuals, statutes, rules, regulation, books and/or industry standards which refer to, reflect or otherwise relate to the incident in question or any potential defense to the action in question.

9. Copies of any and all permits applied for the by the parties to the action in question concerning either the product in question, the accident scene, or anything else relevant to the happening of the accident in question.

10. Copies of any and all permits received by the parties to the action in question concerning either: the product in question, the accident scene, or anything else relevant to the happening of the accident in question.

11. Copies of any and all discovery received from any other parties to the action in question.

12. Copies of any and all reports of the Plaintiffs received by the Defendants, or any other party to this suit, from either the Central Index Bureau (C.I.B.) or from any other source.

13. Copies of any and all reports and/or other investigations performed by O.S.H.A. or any other investigative authority.

14. Copies of any and all medical information and/or documentation concerning the Plaintiffs in this matter whether it concerns any medical condition or treatment which took place before, during or after the time of the incident in question.

15. Copies of any and all records of any type subpoenaed by the Defendant or received from any other source concerning the Plaintiffs or the incident in question.

16. A list of employees present at the job site or accident site their names, addresses and job titles.

17. The reports of any and all medical experts who have reviewed and/or performed any examination in regard to any aspect of this case on behalf of Defendant or Defendant's attorney and who have submitted either oral or written report to Defendant or Defendant's attorney. In the event that a report was oral: provide a complete summary of said report.

18. If any motor vehicle violations/summons or any other summons or complaint was issued in connection with this accident or incident, provide copies of any Municipal Court plea dispositions or transcripts relating thereto.

19. Copies of any and all drawings or diagrams of the accident scene.

20. Complete and legible copies of all complaints (lawsuits) filed against these Defendants within five years prior to the incident which gives rise to this action, which complaints alleged negligent maintenance of this Defendant's premises.

21. Attach hereto a copy of any and all cell phone records covering the period of the date of loss and which is the subject matter of this litigation

Please be advised that Plaintiffs hereby object to the taking of any photographs, x-rays, or other reproductions concerning the Plaintiffs or the Plaintiffs' injuries at the time of the defense examination.

BY: /s/ ROBERT A. LORD  
ROBERT A. LORD

Dated: June 16, 2022



## Civil Case Information Statement

### Case Details: UNION | Civil Part Docket# L-001734-22

**Case Caption:** COURSEY ALTARIQ VS BREWINGTON  
STEPHEN

**Case Initiation Date:** 06/16/2022

**Attorney Name:** ROBERT A LORD

**Firm Name:** LORD, KOBRIN, ALVAREZ & FATTELL

**Address:** 1283 ROUTE 22 EAST

MOUNTAINSIDE NJ 07092

**Phone:** 9082327666

**Name of Party:** PLAINTIFF : coursey, Altariq

**Name of Defendant's Primary Insurance Company**  
(if known): None

**Case Type:** AUTO NEGLIGENCE-PERSONAL INJURY (NON-  
VERBAL THRESHOLD)

**Document Type:** Complaint with Jury Demand

**Jury Demand:** YES - 6 JURORS

**Is this a professional malpractice case?** NO

**Related cases pending:** NO

**If yes, list docket numbers:**

**Do you anticipate adding any parties (arising out of same  
transaction or occurrence)?** NO

**Does this case involve claims related to COVID-19?** NO

**Are sexual abuse claims alleged by: Altariq coursey?** NO

### THE INFORMATION PROVIDED ON THIS FORM CANNOT BE INTRODUCED INTO EVIDENCE

CASE CHARACTERISTICS FOR PURPOSES OF DETERMINING IF CASE IS APPROPRIATE FOR MEDIATION

**Do parties have a current, past, or recurrent relationship?** NO

**If yes, is that relationship:**

**Does the statute governing this case provide for payment of fees by the losing party?** NO

**Use this space to alert the court to any special case characteristics that may warrant individual  
management or accelerated disposition:**

**Do you or your client need any disability accommodations?** NO

**If yes, please identify the requested accommodation:**

**Will an interpreter be needed?** NO

**If yes, for what language:**

**Please check off each applicable category: Putative Class Action?** NO **Title 59?** NO **Consumer Fraud?** NO

I certify that confidential personal identifiers have been redacted from documents now submitted to the court, and will be redacted from all documents submitted in the future in accordance with *Rule 1:38-7(b)*

06/16/2022  
Dated

/s/ ROBERT A LORD  
Signed



# EXHIBIT B



ALTARIQ COURSEY  
vs.  
STEPHEN BREWINGTON, ET AL

Plaintiff  
Defendant

Superior Court of New Jersey  
Law Division  
Union County  
Docket Number: UNN-L-001734-22

**Person to be served (Name & Address):**

STEPHEN BREWINGTON  
5221 MAWOOD STREET  
FAYETTEVILLE, NC 28314

**Attorney:**

Robert Lord, Esq.

**AFFIDAVIT OF SERVICE**

(For Use by Private Service)



STS2022020577

Cost of Service pursuant to R. 4:4-3(c)

\$ \_\_\_\_\_

**Papers Served:** Summons, Complaint, Designation Of Trial Counsel, Demand for Interrogatories, Jury Demand, Certification Of Counsel, Demand for Production of Documents, CIS, Lawyers Referral List

**Service Data:**

Served Successfully X Not Served \_\_\_\_\_ Date: 6/27/2022 Time: 9:15 am Attempts: \_\_\_\_\_

X Delivered a copy to him / her personally

Name of Person Served and relationship / title:

\_\_\_\_\_ Left a copy with a competent household member over 14 years of age residing therein

\_\_\_\_\_ Left a copy with a person authorized to accept service, e.g. managing agent, registered agent, etc.

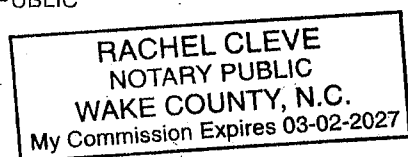
**Description of Person Accepting Service:**

Sex: M Age: 48 Height: 6' Weight: 225 Skin Color: BLACK Hair Color: BLACK

**Comments or Remarks:****Server Data:**

To Be Used Where Electronic Signature Not Available  
Served Data: Subscribed and Sworn to before me on  
July 14 2022 by the affiant who is personally known to me

*Rachel Cleve*  
NOTARY PUBLIC



I, JEFF MERRITT, was at the time of service a competent adult not having a direct interest in the litigation. I declare under penalty of perjury that the foregoing is true and correct.

*Jeff Merritt* 7/14/2022  
Signature of Process Server Date

STATUS, L.L.C.  
PO Box 370  
Bayville, NJ 08721  
(908) 688-1414  
Our Job Serial Number: STS-2022020577  
Ref: NA

# EXHIBIT C

Altariq Coursey  
vs.  
Stephen Brewington et al

Plaintiff  
Defendant

Circuit Court of New Jersey  
Law Division  
Union County  
Docket Number: UNN-L-001734-22

**Person to be served** (Name & Address):  
Schoonmaker Services, LLC  
4991 County Road N  
Sun Prairie, WI 53590

## AFFIDAVIT OF SERVICE

(For Use by Private Service)

**Attorney:**  
Status, LLC  
PO Box 370  
Bayville, NJ 08721

**Papers Served:** Summons & Complaint, Designation Of Trial Counsel, Demand For Interrogatories, Jury Demand, Certification Of Counsel, Demand For Production Of Documents, CIS, Lawyers Referral List.

### Service Data:

Served Successfully X Not Served \_\_\_\_\_ Date: 7/3/2022 Time: 1:25 pm Attempts: \_\_\_\_\_

\_\_\_\_\_ Delivered a copy to him / her personally

Name of Person Served and relationship / title:

\_\_\_\_\_ Left a copy with a competent household member over 14 years of age residing therein

Erica Schoonmaker

Registered Agent

X Left a copy with a person authorized to accept service, e.g. managing agent, registered agent, etc.

### Description of Person Accepting Service:

Sex: F Age: 44 Height: 5'7" Weight: 160 Skin Color: white Hair Color: brown

### Unserved:

- ( ) Defendant is unknown at the address furnished by the attorney  
( ) All reasonable inquiries suggest defendant moved to an undetermined address  
( ) No such street in municipality  
( ) No response on: \_\_\_\_\_ Date \_\_\_\_\_ Time \_\_\_\_\_  
\_\_\_\_\_ Date \_\_\_\_\_ Time \_\_\_\_\_  
( ) Other: \_\_\_\_\_

### Comments or Remarks:

Server D  
Subscribed and Sworn to before me on the 4th day of July, 2022 at the affiant who is personally known to me.  
*Catharine A. Hindler*  
NOTARY PUBLIC  
STATE OF WISCONSIN/ILLINOIS  
MY COMMISSION EXPIRES: 4-28-26

I, Gregory Kowal, was at the time of service a competent adult not having a direct interest in the litigation. I declare under penalty of perjury that the foregoing is true and correct.

Signature of Process Server \_\_\_\_\_ Date \_\_\_\_\_

Status, LLC  
PO Box 370  
Bayville, NJ 08721  
(877) 899-7828  
Our Job Serial Number: GWK-2022003868  
Ref: 2022020579

# EXHIBIT D

**WILSON, ELSE, MOSKOWITZ, EDELMAN & DICKER LLP**

**Gina Calabria, Esq. (Attorney I.D. No.: 29752002)**

**Anthony M. Tracy, Esq. (Attorney I.D. No.: 030841990)**

**Kristen M. Gaffey, Esq. (Attorney I.D. No.: 281152019)**

**200 Campus Drive**

**Florham Park, New Jersey 07932-0668**

**Tel: (973) 624-0800 \* Fax: (973) 624-0808**

**Attorneys for Defendants Stephen Brewington and Schoonmaker Cattle Services, LLC (i/p/a Schoonmaker Services, LLC)**

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ALTARIQ COURSEY,

Plaintiff(s),

vs.

STEPHEN BREWINGTON, SCHOONMAKER  
SERVICES, LLC, ABC CORPS 1-5, JOHN DOES  
1-5, (said names being fictitious names as true  
names are unknown at this time),

Defendants.

---

: SUPERIOR COURT OF NEW JERSEY  
: LAW DIVISION: UNION COUNTY  
: DOCKET NO.: UNN-L-1734-22  
:  
:  
:

Civil Action

**NOTICE OF REMOVAL TO FEDERAL  
COURT**

**TO:** Robert A. Lord, Esq.  
Lord, Korbin, Alvarez & Fattell, LLC  
1283 Route 22 East  
Mountainside, NJ 17092  
Attorneys for Plaintiffs

**COUNSEL:**

**PLEASE TAKE NOTICE** that in the above-entitled matter, Stephen Brewington and Schoonmaker Cattle Services (hereinafter "Defendants"), by and through their undersigned attorneys, Wilson, Elser, Moskowitz, Edelman & Dicker, LLP, on this date have filed a Notice of Removal of a Civil Action from the Superior Court of New Jersey, Law Division, Union County, to the United States District Court for the District of New Jersey, together with all process, pleadings, and Orders, as required by 28 U.S.C. § 1446(a), copies of which are attached hereto, and made part hereof.

**PLEASE TAKE FURTHER NOTICE**, that Defendants hereby file this Notice and Notice of Removal with the Union County Clerk of the Superior Court of New Jersey, Law Division, in accordance with 28 U.S.C. § 1446.

WILSON, ELSER, MOSKOWITZ, EDELMAN & DICKER LLP  
Attorneys for Defendants Stephen Brewington and Schoonmaker  
Cattle Services, LLC (i/p/a Schoonmaker Services, LLC)

By: /s/ *Kristen M. Gaffey*  
Kristen M. Gaffey, Esq.  
Anthony Tracy, Esq.

Dated: July 22, 2022

**WILSON, ELSE, MOSKOWITZ, EDELMAN & DICKER LLP**

**Gina Calabria, Esq. (Attorney I.D. No.: 29752002)**

**Anthony M. Tracy, Esq. (Attorney I.D. No.: 030841990)**

**Kristen M. Gaffey, Esq. (Attorney I.D. No.: 281152019)**

**200 Campus Drive**

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**Tel: (973) 624-0800 \* Fax: (973) 624-0808**

**Attorneys for Defendants Stephen Brewington and Schoonmaker Cattle Services, LLC  
(i/p/a Schoonmaker Services, LLC)**

UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY

---

ALTARIQ COURSEY,

PLAINTIFF(S),

VS.

STEPHEN BREWINGTON, SCHOONMAKER  
SERVICES, LLC, ABC CORPS 1-5, JOHN DOES:  
1-5, (SAID NAMES BEING FICTITIOUS  
NAMES AS TRUE NAMES ARE UNKNOWN  
AT THIS TIME),

DEFENDANTS.

---

:  
: Civil Action No. \_\_\_\_\_

:  
: **CORPORATE DISCLOSURE**  
: **STATEMENT**

Defendant, Schoonmaker Cattle Services, LLC (i/p/a Schoonmaker Services, LLC),  
through its counsel of record hereby submits the following disclosure statement pursuant to Rule  
7.1 of the Federal Rules of Civil Procedure and states as follows:

Schoonmaker Cattle Service, LLC is a non-governmental corporate entity that does not  
have a publicly held corporation that owns 10% or more of their stock. Schoonmaker Cattle  
Service, LLC does not have a parent corporation.

WILSON, ELSER, MOSKOWITZ, EDELMAN & DICKER LLP  
Attorneys for Defendants Stephen Brewington and Schoonmaker  
Cattle Services, LLC (i/p/a Schoonmaker Services, LLC)

By: /s/ *Kristen M. Gaffey*  
Kristen M. Gaffey, Esq.  
Anthony Tracy, Esq.

Dated: July 22, 2022



**WILSON, ELSE, MOSKOWITZ, EDELMAN & DICKER LLP**

**Gina Calabria, Esq. (Attorney I.D. No.: 29752002)**

**Anthony M. Tracy, Esq. (Attorney I.D. No.: 030841990)**

**Kristen M. Gaffey, Esq. (Attorney I.D. No.: 281152019)**

**200 Campus Drive**

**Florham Park, New Jersey 07932-0668**

**Tel: (973) 624-0800 \* Fax: (973) 624-0808**

**Attorneys for Defendants Stephen Brewington and Schoonmaker Cattle Services, LLC  
(i/p/a Schoonmaker Services, LLC)**

UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY

_____	:	
ALTARIQ COURSEY,	:	Civil Action No. _____
	:	
PLAINTIFF(S),	:	<b>APPLICATION FOR EXTENSION OF</b>
	:	<b>TIME TO ANSWER, MOVE, OR</b>
VS.	:	<b>OTHERWISE REPLY</b>
	:	
STEPHEN BREWINGTON, SCHOONMAKER	:	
SERVICES, LLC, ABC CORPS 1-5, JOHN DOES:	:	
1-5, (SAID NAMES BEING FICTITIOUS	:	
NAMES AS TRUE NAMES ARE UNKNOWN	:	
AT THIS TIME),	:	
	:	
DEFENDANTS.	:	
_____	:	

Application is hereby made for a Clerk's Order extending time within which Defendants Stephen Brewington and Schoonmaker Cattle Services, LLC (i/p/a Schoonmaker Services, LLC) (hereinafter "Defendants") may answer, move, or otherwise reply to the Complaint filed by Plaintiffs herein and it is represented that:

1. No previously extension has been obtained;
2. Service of Process of Plaintiff's Summons and Complaint was effected on June 27, 2022 and July 3, 2022;
3. Defendants' Notice of Removal to this Court was filed on July 22, 2022;

4. The time to Answer, Move, or otherwise reply to Plaintiffs' Complaint has not expired as it is currently due by July 29, 2022; and
5. Therefore, pursuant to the 14-day extension, the Time to Answer, Move, or otherwise Reply to Plaintiffs' Complaint expires on August 5, 2022.

WILSON, ELSER, MOSKOWITZ, EDELMAN & DICKER LLP  
Attorneys for Defendants Stephen Brewington and Schoonmaker  
Cattle Services, LLC (i/p/a Schoonmaker Services, LLC)

By: /s/ *Kristen M. Gaffey*  
Kristen M. Gaffey, Esq.  
Anthony Tracy, Esq.

Dated: July 22, 2022

**WILSON, ELSER, MOSKOWITZ, EDELMAN & DICKER LLP**

**Gina Calabria, Esq. (Attorney I.D. No.: 29752002)**

**Anthony M. Tracy, Esq. (Attorney I.D. No.: 030841990)**

**Kristen M. Gaffey, Esq. (Attorney I.D. No.: 281152019)**

**200 Campus Drive**

**Florham Park, New Jersey 07932-0668**

**Tel: (973) 624-0800 \* Fax: (973) 624-0808**

**Attorneys for Defendants Stephen Brewington and Schoonmaker Cattle Services, LLC  
(i/p/a Schoonmaker Services, LLC)**

UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY

\_\_\_\_\_  
ALTARIQ COURSEY,

PLAINTIFF(S),

VS.

STEPHEN BREWINGTON, SCHOONMAKER  
SERVICES, LLC, ABC CORPS 1-5, JOHN DOES:  
1-5, (SAID NAMES BEING FICTITIOUS  
NAMES AS TRUE NAMES ARE UNKNOWN  
AT THIS TIME),

DEFENDANTS.  
\_\_\_\_\_

:  
: Civil Action No. \_\_\_\_\_

**NOTICE OF APPEARANCE**

**PLEASE TAKE NOTICE** that Anthony Tracy, Esq., of Wilson, Elser, Moskowitz, Edelman & Dicker LLP, Attorneys for Defendants Stephen Brewington and Schoonmaker Cattle Services, LLC (i/p/a Schoonmaker Services, LLC) hereby enters an appearance on behalf of Defendants in the above-captioned matter.

WILSON, ELSER, MOSKOWITZ, EDELMAN & DICKER LLP  
Attorneys for Defendants Stephen Brewington and Schoonmaker  
Cattle Services, LLC (i/p/a Schoonmaker Services, LLC)

By: /s/ Anthony Tracy  
Anthony Tracy, Esq.

Dated: July 22, 2022

**WILSON, ELSER, MOSKOWITZ, EDELMAN & DICKER LLP**

**Gina Calabria, Esq. (Attorney I.D. No.: 29752002)**

**Anthony M. Tracy, Esq. (Attorney I.D. No.: 030841990)**

**Kristen M. Gaffey, Esq. (Attorney I.D. No.: 281152019)**

**200 Campus Drive**

**Florham Park, New Jersey 07932-0668**

**Tel: (973) 624-0800 \* Fax: (973) 624-0808**

**Attorneys for Defendants Stephen Brewington and Schoonmaker Cattle Services, LLC  
(i/p/a Schoonmaker Services, LLC)**

UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY

\_\_\_\_\_  
ALTARIQ COURSEY,

PLAINTIFF(S),

VS.

STEPHEN BREWINGTON, SCHOONMAKER  
SERVICES, LLC, ABC CORPS 1-5, JOHN DOES:  
1-5, (SAID NAMES BEING FICTITIOUS  
NAMES AS TRUE NAMES ARE UNKNOWN  
AT THIS TIME),

DEFENDANTS.  
\_\_\_\_\_

:  
: Civil Action No. \_\_\_\_\_  
:

**CERTIFICATION OF SERVICE**

I hereby certify that on July 22, 2022, the attached Notice of Removal, Civil Cover Sheet, Corporate Disclosure Statement, Notice of Appearance, and Application for Extension of Time were filed with the Clerk of the U.S. District Court, District of New Jersey and served on all counsel of record electronically via ECF filing system, email, and regular mail.

WILSON, ELSER, MOSKOWITZ, EDELMAN & DICKER LLP  
Attorneys for Defendants Stephen Brewington and Schoonmaker  
Cattle Services, LLC (i/p/a Schoonmaker Services, LLC)

By: /s/ Kristen M. Gaffey  
Kristen M. Gaffey, Esq.  
Anthony Tracy, Esq.

Dated: July 22, 2022

CERTIFICATE OF MAILING

I, Lisette Valentin, certify that a true copy of the within Notice of Notice of Removal and supporting papers were properly and in accordance with the New Jersey Rules of Court served upon counsel via e-courts, email, and regular mail:

Robert A. Lord, Esq.  
Lord, Korbin, Alvarez & Fattell, LLC  
1283 Route 22 East  
Mountainside, NJ 17092  
Attorneys for Plaintiffs

I further certify that the within Notice and supporting papers have been properly and in accordance with the New Jersey Rules of Court filed with the Union County Superior Court via e-Courts.

Dated: July 22, 2022

/s/ Lisette Valentin  
Lisette Valentin